

EXHIBIT E

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

PRO-LIFE ACTION MINISTRIES, Case No. 23-CV-00853
LUCY MALONEY, THOMAS WILKIN, (ECT/DJF)
and DEBRA BRAUN,

Plaintiffs,

vs.

CITY OF MINNEAPOLIS, a
Minnesota municipality,

Defendant.

The VIDEOTAPED DEPOSITION of LISA R. GOODMAN,
taken pursuant to Notice of Taking Deposition, at
150 South Fifth Street, Suite 3100, Minneapolis,
Minnesota, before Gail M. Hinrichs, Registered
Professional Reporter and Notary Public, taken on the
27th day of August, 2024, commencing at approximately
10:06 a.m.

A P P E A R A N C E S

APPEARING FOR THE PLAINTIFFS:

B. TYLER BROOKS, ESQUIRE
NATHAN LOYD, ESQUIRE
THOMAS MORE SOCIETY
309 West Washington Street
Suite 1250
Chicago, Illinois 60606

email: tbrooks@thomasmoresociety.org
nloyd@thomasmoresociety.org

APPEARING FOR THE DEFENDANT:

TRACEY FUSSY, ESQUIRE
SARA LATHROP, ESQUIRE
MUNAZZA HUMAYUN, ESQUIRE
CITY OF MINNEAPOLIS ATTORNEY'S OFFICE
105 Fifth Avenue South
Suite 200
Minneapolis, Minnesota 55401

email: Tracey.Fussy@minneapolismn.gov
Sara.Lathrop@minneapolismn.gov
Munazza.Humayun@minneapolismn.gov

ALSO PRESENT: Brian Gibson and Debra Braun, Plaintiffs
Adam Wallin, Video Operator

*The Original is in the possession of
Attorney B. Tyler Brooks.*

* * *

1 VIDEO OPERATOR: We are on the
2 record. This is the video recorded deposition of
3 Lisa R. Goodman, taken on August 27, 2024. The time
4 now is 10:06 a.m. This deposition is being taken in
5 the matter of Pro-Life Action Ministries, Lucy
6 Maloney, Thomas Wilkin and Debra Braun versus the
7 City of Minneapolis, United States District Court,
8 District of Minnesota, case number 23-CV-00853,
9 ECT/DJF.

10 This deposition is taking place in
11 Minneapolis, Minnesota. My name is Adam Wallin.
12 I'm the videographer representing Kirby Kennedy and
13 Associates.

14 Will counsel please identify themselves
15 for the record.

16 MR. BROOKS: Yes. This is Tyler
17 Brooks, counsel for the plaintiffs.

18 MR. LOYD: This is Nathan Loyd,
19 counsel for the plaintiffs.

20 MS. LATHROP: My name is Sara
21 Lathrop, I'm an assistant city attorney, I'm an
22 attorney for the defendant.

23 MS. FUSSY: Tracey Fussy for the
24 defendant.

25 MS. HUMAYUN: Munazza Humayun for

1 the defendant.

2 VIDEO OPERATOR: Will the court
3 reporter please swear in the witness.

4 LISA R. GOODMAN,
5 after having been duly sworn, was examined and
6 testified on her oath as follows:

7
8 EXAMINATION

9 BY MR. BROOKS:

10 Q Well, good morning, Ms. Goodman. I'll
11 ask the first question, would you like me to refer
12 to you as Ms. Goodman or Council Member Goodman?
13 Which do you prefer? I'll do whichever.

14 A Ms. Goodman is good. You can refer to me
15 as Lisa as well if you like.

16 Q Oh, I don't want to do that, but if I do
17 refer to you as Council Member Goodman --

18 A It's okay. I respond to that also.

19 Q Okay. If I do that, I'm not trying to
20 imply that you are currently a member of the city
21 council. I'm just --

22 A It's an honorary term. I think it might
23 be okay.

24 Q Okay. Quickly, have you ever been
25 deposed before?

1 chiefs. So I don't even remember who it even was,
2 more or less who I would or would not have reached
3 out to.

4 Q Okay. And then there's this email, the
5 last one, is Timothy Stanley to you, October 26, the
6 same day, just a little later in the afternoon. It
7 says: Lisa, I hate to say this, but this is the
8 bureaucratic/protect my fiefdom b.s. that has always
9 prevented us from moving an ordinance in either city
10 hall. I'm going to stop there.

11 Does either city hall, is that a term of
12 art in the Twin Cities to mean Minneapolis and Saint
13 Paul?

14 MS. HUMAYUN: Objection to the
15 extent it calls for speculation.

16 THE WITNESS: I don't know. That's
17 a good analysis, but I don't know.

18 BY MR. BROOKS:

19 Q Okay. I just didn't know if, since I am
20 not from here, if that's a way to refer to the Twin
21 Cities.

22 So you don't know what he means then by
23 "either city hall"?

24 A I don't.

25 Q Okay. He says: I tire of the big talk.

1 As I told you earlier, we've needed to do this for
2 years, even though all we're doing is reiterating
3 the FACE Act and asking permission to paint the
4 sidewalk, but our bandwidth is stretched and we need
5 to maximize impact. Keep the pressure on and let me
6 know how I can help.

7 Going to the FACE Act, do you recall
8 looking at a document earlier that I said was the
9 FACE Act?

10 A The Freedom of Access to Clinic Act?

11 Q Yes.

12 A Did you show me a copy of that before?

13 Q I did.

14 A Okay. And what was the question?

15 Q I was asking if you recall that I did
16 that.

17 A Apparently not.

18 Q Okay. That doesn't matter and I'll
19 rephrase the question.

20 A Sorry.

21 Q When he referred to the FACE Act here,
22 did you know what he was referring to?

23 A I don't think so, but I'm not sure. I
24 might have at the time, but I don't recall now.

25 Q Okay. So you wouldn't know whether the

1 ordinance as it was crafted on October 26 was simply
2 reiterating the FACE Act or not?

3 A No.

4 Q Okay. I'm going to -- this one should be
5 simple --

6 A Is this one done?

7 Q Yes, ma'am. Hopefully this will be
8 simple, MPLS 001290.

9 (Whereupon Exhibit 18 was marked for
10 identification.)

11 BY MR. BROOKS:

12 Q Does this look familiar to you?

13 A Yes and no. I mean I've seen lots of
14 presentations and that kind of thing, and that's
15 what this is.

16 Q Okay. If you recall, and I don't want
17 you to speculate, if you recall, was this
18 presentation made at the city council meeting where
19 the ordinance was voted on?

20 A I'm going to say probably because there's
21 always a staff presentation before a public hearing.
22 So this is likely what that was. I believe the
23 public hearing was on November 9. Am I wrong about
24 that?

25 Q I think that's correct.